

EXHIBIT D



SKINNER LAW GROUP

LOS ANGELES | PHILADELPHIA | ATLANTA

March 10, 2022

Laurie Alberts Salita
PHILADELPHIA
484.875.3159 *direct*
salita@skinnerlawgroup.com

VIA EMAIL & FEDERAL EXPRESS

amonis@atslab.com

Applied Technical Services, Inc.
1049 Triad Court
Marietta, GA 30062

contactus@amfaviation.com

AMF Aviation, Inc.
4428 Airport Rd.
Springfield, TN 37172

Re: Cessna T303 Crusader – N303TL
DOL: August 17, 2019
Lagrangeville, NY

To whom it may concern,

This firm represents Continental Aerospace Technologies, Inc., formerly Continental Motors, Inc. (“Continental”) in connection with the above-referenced aircraft accident and resulting litigation. We understand that you may have had or may currently be in possession of parts of the T303 wreckage including but not limited to its engines.

As you may know, the accident involving this aircraft has generated multiple lawsuits filed in multiple jurisdictions. We are involved in two of these matters, one in New York state court and one in Delaware Federal Court.

As you may also know, the Wolk Law Firm has noticed an inspection of certain portions of the wreckage, including its engines, at Applied Technical Services, Inc. on March 23-24, 2022. Continental has advised counsel that it objects to this inspection while discovery is stayed in New York and while certain motions are pending in Delaware. We are, therefore, in the process of moving for a Protective Order in the United States District Court for the District of Delaware. **The scheduled wreckage inspection should not proceed until after Continental’s motion is resolved.** Absent a court order from the United States District Court for the District of Delaware permitting the inspection to proceed, inspection of the T303 wreckage or any portion thereof over Continental’s objection on March 23-24, 2022 may be deemed spoliation and/or destruction of evidence.

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In short, please consider this Continental's written notification that it objects to having any part of the T303 wreckage made available for inspection on March 23-24, 2022. We urge all involved parties to reschedule the same.

If you have any questions, do not hesitate to give me a call.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'L. Salita', with a long horizontal flourish extending to the right.

Laurie A. Salita

cc: Counsel in the Dutchess County and Nassau County, New York cases
and Delaware Federal Court matter per attached service list via email only.



THE WOLK LAW FIRM

AIRLAW

1710-12 Locust Street
Philadelphia, PA 19103
215-545-4220 Fax 215-545-5252
E-mail: airlaw@airlaw.com
www.airlaw.com

Arthur Alan Wolk
Cynthia M. Devers
Michael S. Miska

March 11, 2022

TO: All Counsel
(See Attached Service List)

Re: Cessna T303 Crusader – N303TL
Date of Accident: August 18, 2019
Location: 235 South Smith Road, Lagrangeville, NY

Dear Counsel:

I trust you received Ms. Salita's letter. If you recall, we moved this inspection to March 23-24 from dates previously scheduled in January in order to accommodate Continental. Last week, after months had passed, Continental raised an objection to the inspection. This was not due to scheduling unavailability, but under the guise of an unfounded argument that we should ignore the various scheduling orders in place so that a motion to dismiss it filed in the Delaware litigation could be heard. Since all of the parties have no doubt gone to extensive lengths to schedule this and secure necessary participants, Plaintiffs did not agree to postpone the inspection indefinitely, as Continental wanted.

It should also be noted there is no stay in the Delaware matter, and overall no reason the inspection should not go forward for the benefit of all involved in this litigation. I have made arrangements, as have my consultants, to be in Atlanta, as I am sure many of you have also done. Given this late and inappropriate behavior, I do intend to seek costs from Continental, and encourage the other parties to do so as well.

Unrelated, I have no idea why AMF Aviation was copied on this letter. They are not the wreckage custodian, and I object to any wreckage custodian being put in the middle of litigation as Continental seeks to do. Mr. Paul Roche is counsel for the owner of the wreckage and has the say as to what goes on with this, not Continental.

All Counsel
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I hope to see you all in Atlanta and will keep you apprised of the ruling in Delaware. A telephonic conference regarding Continental's discovery dispute for the wreckage inspection is scheduled to take place on March 21, 2022.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Miska", with a long horizontal flourish extending to the right.

MICHAEL S. MISKA

MSM/vg